

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TEMUJIN KENSU,

Plaintiff,

v.

Case No.: 22-cv-11834

DANA NESSEL, individually
and in her official capacity as Attorney
General of the State of Michigan,

Defendant.

**MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS'
MOTION TO DISMISS**

NOW COMES Plaintiff TEMUJIN KENSU, by and through his attorneys, with this Motion for Extension of Time to Respond to Defendants' Motion to Dismiss and hereby states the following:

1. Defendants filed their Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b) on October 6, 2022 (ECF 008).
2. Plaintiff's Response to Defendants' Motion to Dismiss is currently due on November 26, 2022.
3. Plaintiff's counsel has been unable to schedule a call with Plaintiff to begin responding to the Motion. The Michigan Department of Corrections has thus far refused to schedule a call due to the COVID restrictions being lifted.

Unfortunately, this only allows Plaintiff to speak to his attorneys in 15 minute increments, and during sporadic times during the workday. Plaintiff's counsel is now urging the Warden to schedule this call so that Plaintiff and his attorney can prepare said response. Due to such, Plaintiff is seeking an additional extension to file their response to Defendants' Motion to Dismiss.

4. Plaintiff respectfully requests an additional 14-day extension of time to file their Response to Defendants' Motion to Dismiss, making the Response due on or before December 9, 2022.

5. The hearing on Defendants' Motion to Dismiss is set to be heard on January 10, 2023. Plaintiff respectfully requests that the hearing date be adjourned to allow for the full briefing of the present motion with the requested extension.

6. Plaintiff has conferred with Defendants on the details of the present Motion. Defendants will not oppose the present Motion.

7. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

WHEREFORE Plaintiff requests that the Court approve the foregoing Motion.

Date: November 21, 2022

Respectfully submitted,



Keith Altman, Esq.
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CERTIFICATE OF SERVICE

I certify that on November 21, 2022, I served the foregoing Motion for Extension of Time to Respond to Defendants' Motion to Dismiss upon all parties herein by filing copies of same using the ECF System.

Respectfully Submitted,



Keith Altman, Esq.